

TAS4



*Environmental Protection Division
Water Quality & RCRA (ENV-RCRA)*
P.O. Box 1663, Mail Stop K490
Los Alamos, New Mexico 87545
(505) 667-0666/FAX: (505) 667-5224

Date: October 10, 2007
Refer To: ENV-RCRA-07-238
LAUR: 07-6833

Ms. Rebecca Kay
Permits Management program
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303

SUBJECT: INFORMATION SUBMITTAL, LOS ALAMOS NATIONAL LABORATORY (LANL), EPA ID NM0890010515

Dear Ms. Kay:

The purpose of this letter is to submit information regarding the status of the waste box and hazardous waste label you observed at Technical Area 54, Area G, Pad 7 on your site visit of September 25, 2007. The label on the box lacked a legible accumulation start date notation and you requested any available data associated with the waste. The information contained in this submittal includes a copy of the waste logbook notation for this item, the waste profile for the waste stream, and photographs of the original and replacement labels on the box.

Enclosure 1 is a copy of a page from the operating log that includes Item 10033639, the identification for the waste box. The waste description is lid liners from transuranic waste drums managed in Dome 231 with an accumulation start date of November 6, 2006. Enclosure 2 is a copy of the Waste Profile Form for the waste stream that includes these lids. The waste is contact contaminated from management of parent mixed transuranic waste stream containers. Enclosure 3 includes photographs of the hazardous waste label as you saw it on the tour. Enclosure 4 includes photographs of the waste box and the hazardous waste label that was placed on it after your visit.

On a related note, you had asked about storing waste containers outside on the pad. Pad 7 is currently an interim status waste management unit for mixed waste and the waste is stored in compliance with 40 CFR §265, Subpart I standards. The "Los Alamos National Laboratory Technical Area 54 Part B Permit Renewal Application, Revision 3.0," of June 2003 also describes various steel boxes meeting U.S. Department of Transportation standards as allowable storage containers in Section 2.1.1.2.



This information was previously transmitted to you in an email from Gian Bacigalupa dated October 9, 2007. Please contact Gian Bacigalupa at (505) 667-1579 if you have any questions.

Sincerely,



Anthony R. Grieggs
Group Leader
Water Quality & RCRA Group

ARG:GB/lm

Enclosures: a/s

Cy: Gene Turner, LASO/EO, w/o enc., A316
Michael B. Mallory, PADOPS, w/o enc., A102
Richard S. Watkins, ADESHQ, wo/enc, K491
Jack Ellvinger, ENV-RCRA, w/o enc., K490
Gian Bacigalupa, ENV-RCRA, w/o enc., K490
Bob Lechel, ENV-RCRA, w/o enc., J593
Ellen Louderbough, LC-LESH, w/o enc., A187
ENV-RCRA, File, w/enc., K490
IRM-RMMSO, w/enc., A150

Enclosure 1
LA-UR-07-6833

TA-54

Building 8

Operating Log

WMCs'

Tony Bishop

Ph #665-8669

Pager #996-1138

**Louie Romero WMC office: 665-0631
cell: 660-3656**

Generator

Jackie Romero

Cell #699-3014

Pager # 996-3206

Enclosure 2
LA-UR-07-6833

LOS ALAMOS NATIONAL LABORATORY WASTE PROFILE SYSTEM

WPF #: 40396

25-Sep-2007 11:30 AM

(Version: 0)

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Generator :	CHRISTENSEN, DAVIS V	MS :	J595	PH :	6658686	Z#:	113199
WMC :	BISHOP, TONY	MS :	J595	PH :	5056658669	Z#:	120202
Contact :							
RCRA Rev :	MULLEN LORIA	MS :	J599	PH :	5056658680	Z#:	102337
Status :	ACTIVE	Activation Date :	09/20/2007	Expiration Date:	09/20/2008		
Group :	WS-TWPS	TA :	54	Bldg :	000231	Room :	PERMACON

You are required to keep a copy of the WPF(s) in your files for at least three years. This WPF(s) is valid for one year or as long as the composition of the waste you have characterized remains the same. Should your waste change, please submit a new WPF to Waste Acceptance Group.

Waste Accumu : **TSDF Site ID# 469**
 Method of Char : Chemical/Physical Analysis Number: SEE ATTACHED
 Acceptable Knowledge Documentation Number: SEE ADDITIONAL INFO

Waste Type : **Process Waste/Spent Chemical/Other**
 Waste Classes: RCA Waste - **RCA Waste**
 RAD Waste - **Radioactive-LL**

Waste Category: **Inorganic**
Organic
Solvent
Degreaser

Waste Sources : **Repacking (Secondary)**

Waste Matrix : **Debris**

Matrix Type : **Heterogeneous**

Process Desc :
 PID REPACKAGING AND OVERPACKING OF TRU WASTE CONTAINERS. DEBRIS WASTE IS OF CONTACT IN NATURE, WAS GENERATED WHILE PROCESSING CONTAINERS AT TA-54-231 PERMACON. THE PARENT CONTAINERS WERE IN STORAGE CODED AS F001.

Waste Desc : WASTE CONSISTS OF DEBRIS WHICH COULD INCLUDE MISCELLANEOUS CELLULOSICS, (TYVEK, CLOTH, TAPE, CARDBOARD, RUBBER GLOVES, PAPER, ETC.) METAL AND WOOD.

Ignitability : **Not ignitable**

Corrosivity : **Non-aqueous**

Reactivity : **Non-reactive**

Boiling Point : **Not applicable**

Toxicity Characteristic Metals:

Contaminant	Method	Limit	Min	Max	Unit
ARSENIC	TOTA		0.001	0.2	PPM
BARIUM	TOTA		0.003	20.9	PPM
CADMIUM	TOTA		0.002	8.1	PPM
SILVER	TOTA		0.002	0.07	PPM
LEAD	TOTA		0.019	0.29	PPM

**LOS ALAMOS NATIONAL LABORATORY
WASTE PROFILE SYSTEM**

WPF #: 40396

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MERCURY	TOTA	0.00002	0.13	PPM
SELENIUM	TOTA	0.001	0.1	PPM
CHROMIUM	TOTA	0.004	0.12	PPM

Toxicity Characteristic Organic Compounds:

Contaminant	Method	Limit	Min	Max	Unit
METHYL ETHYL KETONE	TOTA		0.03	0.36	PPM
CHLOROFORM	TOTA		0.00716	0.00884	PPM

Additional Chemical Constituents and Contaminants:

CAS NO	Constituent	MIN	MAX	UOM
7440-36-0	ANTIMONY	0.0000001	0.000004	%
95-63-6	1, 2, 4-TRIMETHYLBENZENE	0.000000081	0.0000013	%
	METAL	20	40	%
	WOOD	5	10	%
67-64-1	ACETONE	0.0000016	0.000014	%
7440-41-7	BERYLLIUM	0.0000001	0.0000004	%
117-817	BIS (2-ETHYLHEXYL) PHTHALATE	0.00045	0.001	%
74-83-9	BROMOMETHANE	0.0000027	0.00000327	%
117-84-0	DI-N-OCTYL PHTHLATE	0.000023	0.00013	%
75-09-2	METHYLENE CHLORIDE	0.0000003	0.0000098	%
91-20-3	NAPHTHALENE	0.000000087	0.0000001113	%
7440-02-0	NICKEL	0.0000107	0.000052	%
108-95-2	PHENOL	0.000031	0.000088	%
10042-5	STYRENE	0.000000185	0.000000215	%
108-88-3	TOLUENE	0.0000002	0.0000009	%
7440-62-2	VANADIUM	0.0000004	0.0000005	%
7440-66-6	ZINC	0.00024	0.00583	%
7440-28-0	THALLIUM	0.000000008	0.0000002	%
75-69-4	TRICHLOROFLUOROMETHANE	0.000000905	0.00000109	%
1330-20-7	XYLENE (TOTAL)	0.000000363	0.000000437	%
	MISCELLANEOUS CELLULOSICS	40	60	%

Additional Information: THE WASTE STREAM THAT THIS DEBRIS CONTACT WASTE WAS GENERATED FROM IS VACUUM FILTER SLUDGE FROM TA-50. THE F001 CODE WAS APPLICABLE TO THE PARENT CONTAINERS IN STORAGE. THE F003 CONSTITUENTS PRESENT ARE IN THE SOLID FORM AND THEREFORE DO NOT NEED TO BE CODED BECAUSE THEY ARE NOT IGNITABLE. THE F005 CONSTITUENT PRESENT IS FROM AN UNKNOWN SOURCE, BUT AS A CONSERVATIVE APPROACH SHOULD BE CODED AS SUCH. THE DATA BEING USED IS FROM ANALYTICAL DATA OF MORE RECENTLY GENERATED CONTAINERS FROM THE WASTE STREAM, IS APPLICABLE TO PREVIOUSLY GENERATED CONTAINERS BASED UPON THE PROCESSES THAT GENERATE THE WASTE STREAM HAS NOT CHANGED. THIS DEBRIS WASTE STREAM IS OF CONTACT NATURE, THIS WASTE CONTAINS LESS CONTAMINATION THAN THE LEVEL OF THE ACTUAL VACUUM FILTER SLUDGE WASTE ITSELF. THE F002 CONSTITUENT IS PRESENT AND SHOULD BE CODED FOR. SECTION 7- ACCESS CONTROLLED AREA.

LDR and Underlying Hazardous Constituents Information

Non-Wastewater/Wastewater Category: **Non Wastewater**

WASTE CHARACTERIZATION INFORMATION

Radioactivity Category : **RADIOACTIVE-LL**

LOS ALAMOS NATIONAL LABORATORY
WASTE PROFILE SYSTEM

WPF #: 40396

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RCRA Category : **HAZARDOUS WASTE**

Secondary Info : N/A

Waste Classification : **MIXED LOW-LEVEL WASTE**

Waste Acceptances : **Area L/G Mixed Low-Level Acceptance**

EPA Hazardous Waste Code : **F001 F002 F005**

Notification Of Underlying Hazardous Constituents:

Constituents

No Underlying Hazardous Constituents in this waste stream

LOS ALAMOS NATIONAL LABORATORY
WASTE PROFILE SYSTEM

WPF #: 40396

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GWCP Information

Section 1 - Waste Prevention/Minimization (answer all questions)

Can hazard segregation, elimination, or material substitution be used?

Yes* No

Can any of the materials in the waste stream be recycled or reused

Yes* No

Has waste minimization been incorporated into procedures or other process controls?

Yes No

Can this waste be generated outside a RCA?

Yes* No N/A

*Provide Comment

Section 6 - Work Control Documentation (answer all questions)

Do the procedures for this process cover how to manage this waste?

Yes No (Provide comments)

Do the procedures for this process cover controls to prevent changes to waste constituents and concentrations or addition or removal of waste?

Yes No (Provide comments)

Section 7 - Package and Storage Control

Describe how the waste will be packaged in according to the applicable WAC:

MATERIAL WILL BE BAGGED AND PLACED INTO METAL CONTAINERS.

Identify the storage management controls that will be used for this waste stream: (check all that apply)

- Tamper indication devices:
- Limited use locks with log-in for waste
- Locked cabinet or building
- Other (describe)

Section 8 - Waste Certification Statements (check only one)

Waste appears to meet WAC chapter for:

MIXED LOW LEVEL WASTE LANL WAC CHAPTER #7

Waste needs exception/exemption for treatment, storage, or disposal at:

Waste does not meet the criteria for any known TSDF, (DOE approval is required. Contact the Waste Management Program Office for assistance.)

Estimated Annual Volume (m3):

8

Enclosure 3
LA-UR-07-6833

HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL.

IF FOUND, CONTACT THE NEAREST POLICE OR PUBLIC SAFETY AUTHORITY OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY.

GENERATOR INFORMATION:

NAME LOS ALAMOS NATIONAL LABORATORY

ADDRESS P.O. BOX 1663 PHONE _____

CITY LOS ALAMOS STATE NM ZIP 87545

EPA ID NO. / MANIFEST DOCUMENT NO. NM0890010515 / _____

ACCUMULATION START DATE _____ EPA WASTE NO. _____

D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

HANDLE WITH CARE!

STYLE WM8P

Printed by Labelmaster, An American Labelmark Co., Chicago, IL 60648 (800) 621-5808

ITEM NO



10033639

25 12:24 PM

ADDRESS P.O. BOX 1663

PHONE

CITY LOS ALAMOS

STATE NM

EPA ID NO. / MANIFEST DOCUMENT NO. NM0890010515

ACCUMULATION START DATE _____

SHIPPER LOS ALAMOS EPA WASTE NO. _____

40CFR(RCRA) BUT MAY BE SUBJECT TO DEPT OF TRANSPORTATION REGULATIONS (49CFR) OR STATE OR LOCAL REGULATIONS
D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. W

HANDLE WITH CARE

25 12:26 PM
STYLE WM6P

Enclosure 4
LA-UR-07-6833

HAZARDOUS WASTE

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL.

IF FOUND, CONTACT THE NEAREST POLICE, OR PUBLIC SAFETY
AUTHORITY, OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY.

GENERATOR INFORMATION:

NAME LOS ALAMOS NATIONAL LABORATORY

ADDRESS P.O. BOX 1663 PHONE _____

CITY LOS ALAMOS STATE NM ZIP 87545

EPA /MANIFEST
ID NO./ DOCUMENT NO. NM0890010515

ACCUMULATION
START DATE 11-06-06 EPA
WASTE NO. F001
F002, F005

D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

HANDLE WITH CARE!

STYLE WM6P

Printed by Labelmaster, An American Labelmark Co., Chicago, IL 60646 (800) 621-5806

ITEM NO



10033639

4 7:58 AM

GIC

SDREX

WARNING
STAY CLEAR AT ALL
TIMES WHEN CONTAINER
IS OFF GROUND

**HAZARDOUS
WASTE**
Date: 1/16/04
P/N: 1000-1001
C/Number: 1001001
HANDLE WITH CARE!

07260701/B

**HAZARDOUS
WASTE**
HANDLE WITH CARE!

ITEM NO
1001001

GW-
1555

CAUTION
RADIOACTIVE
MATERIAL
EXTREMELY
HAZARDOUS

27 3:06 PM